

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA**

UNCENSORED AI, INC., a Delaware
corporation,

CASE NO. 8:25-CV-00040

Plaintiff,

**MOTION TO EXTEND RESPONSE
DEADLINE**

vs.

PERPLEXITY, INC.; START ENGINE,
INC.; UNCENSORED.COM;
NOFILTERGPT, INC.; NATIA
CYBERNETICS; SAS; VENICE AI,
INC.; FREEDOMGPT, INC.;
UNCENSORED.AI.IO; AP SOFTWARE,
LTD.; HENRY FORD IN KATU 5; CLINT
NEILSON; CHAT UNCENSORED,
INC.; and ERIC VORHEES

Defendants.

Defendant StartEngine Crowdfunding, Inc., which Plaintiff refers to erroneously in the Complaint as “Start Engine, Inc.” (“Defendant”), respectfully requests a 21 day extension of the deadline for the Defendant to file its response to the Complaint, until May 23, 2025. In support of this Motion, the Defendant states:

1. Defendant was served with the Complaint on April 11, 2025. The current deadline to respond to the Complaint is May 2, 2025, which is 21 days after service. Fed. R. Civ. P. 12(a)(1)(A)(i).

2. Defendant requires an extension of 21 days, to May 23, 2025 to provide additional time to prepare its responsive pleading.

3. Counsel have met and conferred but have not reached an agreement as to the extension. Counsel for Defendant requested a 21 day extension from Counsel for

Plaintiff, but Counsel for Plaintiff responded that Plaintiff would only agree to a seven day extension.

4. Defendant is a Delaware Corporation with its principal place of business in California. At the time of service, Defendant did not have any established relationship to legal counsel in Nebraska and required time to search for, select, and retain counsel.

5. Defendant intends to bring a motion to dismiss the Complaint on multiple grounds, including the lack of personal jurisdiction over Defendant, but requires additional time to compile the evidence and authority to support the motion. Defendant thus believes twenty-one days are necessary for it to prepare the responsive pleading.

6. By filing this Motion Defendant does not waive any defenses; Defendant expressly reserves its right to assert defenses based upon lack of personal jurisdiction, subject matter jurisdiction, lack of process, or insufficient process or any other defense.

WHEREFORE, Defendant respectfully requests the Court grant an extension of 21 days of the deadline to answer or otherwise respond to the Complaint, to May 23, 2025.

Dated this 30th day of April, 2025.

STARTENGINE CROWDFUNDING, INC.
A/K/A START ENGINE, INC., Defendant

By: /s/Lindsay K. Lundholm

Lindsay K. Lundholm, NE# 22224

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CERTIFICATE OF SERVICE

I hereby certify that on April 30, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

Thomas C. Dorwart

tom@dorwartlaw.com

and I hereby certify that I have emailed this document to the following non CM/ECF participants:

None

/s/ Lindsay K. Lundholm